

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

Starellen Carter  
Cinnamon Pierce, et al  
Plaintiff(s),

v.

State of MI  
Carelink  
CBET  
Gwen Ervin  
Laura Fournier Defendant(s).

Case 5:16-cv-10749  
Judge: Levy, Judith E.  
MJ: Davis, Stephanie Dawkins  
Filed: 03-02-2016 At 03:19 PM  
CMP CARTER ET AL V. STATE OF MI ET  
AL (DA)

COMPLAINT

- I. Defendant(s). Print the full name for each defendant. If there are more defendants, use additional pages to provide their names.

Name of Defendant(s)

1. Laura Fournier
2. Gwen Ervin
3. Jean Ward
4. State of MI
5. Carelink

- II. Statement of claim. Briefly state the facts of your case. Describe how each defendant is involved, and exactly what each defendant did, or failed to do. Include names of any other persons involved, dates, and places. You may use additional paper if necessary.

Laura Fournier & Gwen Ervin work for State of MI CPS. Approx 1 month ago Gwen Ervin said she was going to file a petition based upon the ins co Carelink, who held a meeting to try to coerce me into giving my 17 yr old daughter more psychotropic drugs and none of them are doctors who write prescriptions

My daughter Cinnamon has been diagnosed as schizophrenic by some doctors. Other doctors say it's PTSD since she is a rape victim. My daughter was given 600 mg X Seroquel, 450 mg lithium 8mg Haldol, 8mg Ativan to take each day. My physician, Botsford ER physicians, Children's Hosp say it's no way a child should be given high doses of several medications. Everytime my daughter tells someone she is a rape victim or goes thru PTSD phase where she believes she is being raped everyday, someone calls CPS. My mother retired from CPS State of MI. and the State is failing to properly document these facts. CPS is trying to take custody of my daughter based upon hearsay, and Carelink ins co initiation. They want to lock her up and drug her.

III. Relief. Briefly state exactly what you want the court to do for you.

I want the court to stop the harassment by the State of MI. CPS has PREMEDITATED TO TAKE my child away. I am a mother of 6 I do not abuse or neglect my child. My daughter is in a Children's mental hospital and CPS keeps going to the hosp telling my child they are going to take her away from our family. My child is worried and distraught and feels hopeless. They have no right to interfere with her medical treatment. Carelink has to hold a meeting to lock my child away permanently. Carelink knows that they will no longer be the insurance co for my daughter upon discharge from the hosp. If Carelink can get my child locked up & drugged up then they have a client they can collect money on. Everyone of the dependants is relying upon the other dependants and pointing

blame at each other when they are questioned. Carelink has no right to direct CPS to do their dirty work. CPS has no right to try to create medical neglect, especially when my daughter was alone in the hosp when she got a call.

IV. Additional Information. - Briefly enter any additional information, you may use additional paper.

Please stop the harassment of CBET, CARE LINK, LAURA FORNIER Gweal Ervin, CPS, State of MT. As a mother of 6, Cinnamon is my baby. Both my 22 yr old & 19 yr old were given/prescribed psychotropic meds and Both refused to take them, currently they are healthy, mothers and both work 40 hrs a week. Yes Cinnamon needs therapy and that need is always met. She deserves not to be discriminated against nor victimized because she was victimized and now the State, CPS, CBET, et al wants to further victimize & traumatize my daughter.

V. Demand for Jury Trial. Check this box if you want your case to be decided by a jury, instead of a judge.

☐ Plaintiff demands a jury trial on all issues.

Dated:

3-2-16

Plaintiff's Signature

Starellen Carter

Plaintiff's Printed Name

8933 Winston

Street Address

Redford MT 48239

City, State, Zip Code

248-6671440

Telephone Number

executivesuite777@gmail.com

E-mail Address

US 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

(a) PLAINTIFFS Starellen Carter  
Cinnamon Pierce (minor), et al

**DEFENDANTS** State of MI, Corelink INS Co  
CBER, et al

(b) County of Residence of First Listed Plaintiff Wayne  
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Wayne  
(IN U.S. PLAINTIFF CASES ONLY)

Case: 5:16-cv-10749  
Judge: Levy, Judith E.  
MJ. Davis, Stephanie Dawkins  
Filed: 03-02-2016 At 03:19 PM  
CMP CARTER ET AL V. STATE OF MI ET  
AL (DA)

(c) Attorneys (Firm Name, Address, and Telephone Number)

**BASIS OF JURISDICTION** (Place an "X" in One Box Only)

1 U.S. Government  
Plaintiff

☒ 3 Federal Question  
(U.S. Government Not a Party)

☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**NATURE OF SUIT** *(Place an "X" in One Box Only)*

CONTRACT	TORTS	TORTS	TORTURE/PENALTY	BANKRUPTCY	OTHER STATUTES
10 Insurance 20 Marine 30 Miller Act 40 Negotiable Instrument 50 Recovery of Overpayment & Enforcement of Judgment 51 Medicare Act 52 Recovery of Defaulted Student Loans (Excludes Veterans) 53 Recovery of Overpayment of Veteran's Benefits 60 Stockholders' Suits 70 Other Contract 85 Contract Product Liability 96 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input checked="" type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input checked="" type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability  <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other  <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act  <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 IIIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))  <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> 0 Land Condemnation 0 Foreclosure 0 Rent Lease & Ejectment 0 Torts to Land 5 Tort Product Liability 0 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input checked="" type="checkbox"/> 445 Amer. w/Disabilities - Employment <input checked="" type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty  <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**ORIGIN** (Place an "X" in One Box Only)

Original Proceeding    ☐ 2 Removed from State Court    ☐ 3 Remanded from Appellate Court    ☐ 4 Reinstated or Reopened    ☐ 5 Transferred from Another District (specify)    ☐ 6 Multidistrict Litigation

### CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity).

Brief description of cause:

Brief description of cause: Premeditation of harassment, coercion, threats, intimidation, violation of rights

REQUESTED IN COMPLAINT: ☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint:

**JURY DEMAND:**      ☐ Yes      ☐ No

**RELATED CASE(S)**

**IF ANY** (See instructions):

IF ANY (See instructions): JUDGE

DOCKET NUMBER

~~SIGNATURE OF ATTORNEY OF RECORD~~

OFFICE USE ONLY

EPT #	AMOUNT	APPLYING IFP	JUDGE	MAG. JUDGE
-------	--------	--------------	-------	------------

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes

☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes

☒ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

---

## New LawsUIT Check List

**Instructions:** Put a check mark in the box next to each appropriate entry to be sure you have all the required documents.

<input checked="" type="checkbox"/>	Two (2) completed Civil Cover Sheets.	Case: 5:16-cv-10749 Judge: Levy, Judith E. MJ: Davis, Stephanie Dawkins Filed: 03-02-2016 At 03:19 PM CMP CARTER ET AL V. STATE OF MI ET AL (DA)
<input checked="" type="checkbox"/>	Enter the number of defendants named in your lawsuit in the blank below, add 2 and then enter the total in the blank.  <div style="display: flex; align-items: center; justify-content: center;"> <div style="text-align: center; margin-right: 10px;"> <math>\frac{5}{\text{\# of Defendants}}</math> </div> <div style="text-align: center; margin-right: 10px;"> <math>+ 2 =</math> </div> <div style="text-align: center; margin-right: 10px;"> <math>\frac{7}{\text{Total}}</math> </div> <div style="text-align: left;"> <b>Complaints.</b> </div> </div>	
Received by Clerk: _____ Addresses are complete: _____		
<input checked="" type="checkbox"/>	If any of your defendants are <b>government agencies</b> : Provide two (2) extra copies of the <b>complaint</b> for the U.S. Attorney and the Attorney General.	
<b>If Paying The Filing Fee:</b>		<b>If Asking That The Filing Fee Be Waived:</b>
<input checked="" type="checkbox"/>	Current new civil action filing fee is attached.  Fees may be paid by check or money order made out to:  <div style="text-align: center;">Clerk, U.S. District Court</div>	<input checked="" type="checkbox"/> Two (2) completed <b>Application to Proceed in District Court without Prepaying Fees or Costs</b> forms.
Received by Clerk: _____ Receipt #: _____		Received by Clerk: _____
<b>Select the Method of Service you will employ to notify your defendants:</b>		
<b>Service via Summons by Self</b>	<b>Service by U.S. Marshal</b> <small>(Only available if fee is waived)</small>	<b>Service via Waiver of Summons</b> <small>(U.S. Government cannot be a defendant)</small>
<input type="checkbox"/> Two (2) completed <b>summonses</b> for each defendant including each defendant's name and address.          Received by Clerk: _____	<input checked="" type="checkbox"/> Two (2) completed <b>USM – 285 Forms</b> per defendant, if you are requesting the U.S. Marshal conduct service of your complaint.  <input checked="" type="checkbox"/> Two (2) completed <b>Request for Service by U.S. Marshal</b> form.       Received by Clerk: _____	<input type="checkbox"/> You need not submit any forms regarding the Waiver of Summons to the Clerk.  <u>Once your case has been filed, or the Application to Proceed without Prepaying Fees and Costs has been granted, you will need:</u> <ul style="list-style-type: none"> <li>One (1) <b>Notice of a Lawsuit and Request to Waive Service of a Summons</b> form per defendant.</li> <li>Two (2) <b>Waiver of the Service of Summons</b> forms per defendant.</li> </ul> Send these forms along with your filed complaint and a self-addressed stamped envelope to each of your defendants.
<b>Clerk's Office Use Only</b>		
Note any deficiencies here:		